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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF JANE DOE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR COMPLIANCE WITH COURT
ORDER [ECF 162]**

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DECLARATION OF JANE DOE

I, Jane Doe, declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.

2. I am 49 years old and a citizen of Venezuela. I am a member of the National TPS Alliance.

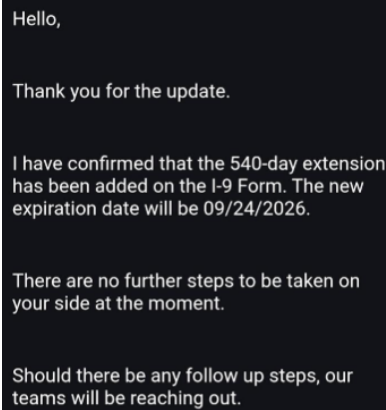
3. I applied for and received Temporary Protected Status (TPS) and an employment authorization document for the first time pursuant to the October 3, 2023 designation of Venezuela.

4. I started to work at an Amazon logistics center in Delaware in March 2024.

5. On January 18, 2025, I re-registered for TPS and applied to renew my work permit under the January 17, 2025 extension of the 2023 designation of Venezuela.

6. That same day, I received a Notice of Action from USCIS dated January 18, 2025, indicating that they had received my employment authorization application and that I qualified for a 540 day automatic extension of my employment authorization.

7. I gave a copy of the Notice of Action to the Amazon Human Resources department. In response, I received an email saying that the 540 day extension had been noted on my form I-9 and that the new expiration date for my work authorization would be September 24, 2026. This is a screenshot of the message:



Hello,

Thank you for the update.

I have confirmed that the 540-day extension has been added on the I-9 Form. The new expiration date will be 09/24/2026.

There are no further steps to be taken on your side at the moment.

Should there be any follow up steps, our teams will be reaching out.

8. Tuesday, June 10, 2025, I worked my normal shift, from 7:00 in the morning until

5:30 in the evening. Around 6:30 in the evening, I received a notification through the Amazon employees app saying that my work permit had expired. This is a screenshot of the message:

Hello,

The Department of Homeland Security (DHS) has announced the termination of the 2023 Temporary Protected Status (TPS) designation for Venezuela. This designation has been terminated effective April 7, 2025.

As a result of this change, your work authorization documentation on file has expired, and you have been placed on an unpaid work authorization Suspension effective June 10, 2025.

You must update your Form I-9 with renewed work authorization documentation by July 10, 2025.

If you are unable to provide updated documentation by July 10, 2025, you will be subject to termination of your employment.

9. Later, around 8:30 at night, I sent an email to the Amazon Human Resources department. I explained that, under the May 30, 2025 decision of this Court, my work permit was still valid. I included a copy of the Court's decision, a link to the USCIS website, and a copy of the Notice of Action extending my work authorization for 540 days.

10. On June 11, 2025, I called Human Resources and spoke to an operator. She told me that if I did not receive a response to my email within 48 hours, I could elevate my complaint.

11. After 48 hours without a response, I elevated my complaint. The next day, I received a response saying that the Department of Homeland Security had announced the termination of the 2023 designation of Venezuela for TPS and, as a result, my work permit had expired.

1 12. Currently, I am suspended without pay from my job at Amazon. If I do not provide
2 a valid work permit before July 10, 2025, they will fire me.

3 13. I am alone in the U.S. and I depend on my job economically to support myself here
4 and to support my mother, who is receiving medical treatment for a chronic kidney condition, and
5 also to support my children who live in Venezuela. In addition, this experience has been
6 emotionally devastating. I feel as if the floor has been pulled out from under my feet, and I do not
7 know what to do.

8 14. It is important to me to share my story, but I am afraid to use my name because I
9 am afraid of retaliation from the government.

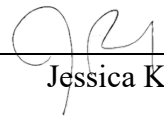
10 I declare under penalty of perjury that the foregoing is true and correct, and that this declaration
11 was executed in Delaware this 17th day of June, 2025.
12

13 /s/Jane Doe

14 Jane Doe

15
16 Translation Certificate

17 I, Jessica Karp Bansal, certify that I am competent to translate from English to Spanish and that
18 this document, Declaración de Jane Doe (Declaration of Jane Doe), is a true and accurate
19 translation of the document from English to Spanish to the best of my knowledge and ability. I
20 declare that this statement is true and accurate, under penalty of perjury, and that this certification
21 was signed in Claremont, California, on June 17, 2025.

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28 
Jessica Karp Bansal

DECLARACIÓN DE JANE DOE

Yo, Jane Doe, declaro:

1. Tengo conocimiento personal de los hechos establecidos en esta declaración. Si se me solicita que declare como testigo, podría hacerlo y testificaría estos hechos.

2. Tengo 49 años y soy ciudadana de Venezuela. Soy miembro de la Alianza Nacional TPS.

3. Solicité y recibí por primera vez el “Temporary Protected Status” (“TPS”) y un documento de autorización de empleo conformes con la designación de Venezuela del 3 de octubre de 2023 .

4. Empecé a trabajar en un centro logístico de Amazon en Delaware en marzo de 2024.

5. El 18 de enero de 2025, volví a registrarme para TPS y solicité renovar mi permiso de trabajo bajo la extensión del 17 de enero de 2025 de la designación de Venezuela de 2023.

6. Ese mismo día, recibí un Aviso de Acción de USCIS con la fecha del 18 de enero de 2025 indicando que se había recibido mi solicitud de autorización de empleo y que calificaba para una extensión automática de 540 días de autorización de empleo.

7. Les di una copia del Aviso de Acción al departamento de Recursos Humanos de Amazon. En respuesta, recibí un correo electrónico diciendo que la extensión de 540 días había sido anotada en mi formulario I-9 y que la nueva fecha de vencimiento para mi autorización de trabajo sería el 24 de septiembre de 2026. Ésta es una captura de pantalla del mensaje:

Hello,

Thank you for the update.

I have confirmed that the 540-day extension has been added on the I-9 Form. The new expiration date will be 09/24/2026.

There are no further steps to be taken on your side at the moment.

Should there be any follow up steps, our teams will be reaching out.

8. El martes, 10 de junio de 2025, trabajé mi turno habitual, de las 7:00 de la mañana hasta las 5:30 de la tarde. Alrededor de las 6:30 de la tarde, recibí una notificación por la aplicación para empleados de Amazon diciendo que mi permiso de trabajo se había vencido. Ésta es una captura de pantalla del mensaje :

Hello,

The Department of Homeland Security (DHS) has announced the termination of the 2023 Temporary Protected Status (TPS) designation for Venezuela. This designation has been terminated effective April 7, 2025.

As a result of this change, your work authorization documentation on file has expired, and you have been placed on an unpaid work authorization Suspension effective June 10, 2025.

You must update your Form I-9 with renewed work authorization documentation by July 10, 2025.

If you are unable to provide updated documentation by July 10, 2025, you will be subject to termination of your employment.

1 9. Más tarde, alrededor de las 8:30 de la noche, envié un correo electrónico a
2 Recursos Humanos de Amazon. Les expliqué que, bajo la decisión del 30 de mayo de 2025
3 de esta Corte, mi permiso de trabajo seguía siendo válido. Incluí una copia de la decisión
4 de la corte, un enlace al sitio web de USCIS, y una copia del Aviso de Acción extendiendo
5 mi permiso de trabajo por 540 días.

6 10. El 11 de junio de 2025, llamé a Recursos Humanos y hablé con un
7 operadora. Ella me dijo que si no recibiera una respuesta a mi correo electrónico dentro de
8 48 horas, podría elevar mi queja a un nivel superior.

9 11. Después de 48 horas sin respuesta, elevé mi queja. El próximo día, recibí una
10 respuesta diciendo que el Departamento de Seguridad Nacional había anunciado la
11 terminación de la designación de Venezuela al TPS 2023 y, como resultado, mi permiso de
12 trabajo se había vencido.

13 12. Actualmente, estoy suspendida sin pago de mi trabajo con Amazon. Si no
14 puedo producir un permiso de trabajo válido antes del 10 de julio de 2025, me despedirán.

15 13. Estoy sola en los EEUU y dependo de mi trabajo economicamente para
16 mantenerme aquí y mantener a mi madre, quien esta recibiendo tratamiento medico por
17 una condicion renal cronica y a mis hijos que permanecen en Venezuela. Además, esta
18 experiencia ha sido emocionalmente devastadora. Siento que se me abrió la tierra debajo
19 de mis pies, y no sé qué hacer.

20 14. Para mí es importante compartir mi historia, pero tengo miedo de usar mi
21 nombre porque temo represalias del gobierno.

22
23 Declaro bajo pena de perjurio que lo antecedente es verdadero y correcto, y que
24 estadeclaración se firmó en Delaware, hoy el día 17 de junio de 2025.

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Jane Doe